

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

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In re: PROMESA
THE FINANCIAL OVERSIGHT AND Title III
MANAGEMENT BOARD FOR PUERTO RICO,
as representative of
THE COMMONWEALTH OF PUERTO RICO, *et al.* No. 17 BK 3283-LTS
Debtors.¹ (Jointly Administered)
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In re: PROMESA
THE FINANCIAL OVERSIGHT AND Title III
MANAGEMENT BOARD FOR PUERTO RICO,
as representative of
PUERTO RICO ELECTRIC POWER AUTHORITY No. 17 BK 4780-LTS
("PREPA"),² (Joint Administration Requested)
Debtor. **Re: Docket No. 250**
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**SUPPLEMENTAL AFFIDAVIT OF NATHAN A. HAYNES IN
SUPPORT OF THE MOTION FOR ORDER (A) PURSUANT TO
PROMESA SECTION 304(G), DIRECTING JOINT ADMINISTRATION
OF INITIAL TITLE III CASES AND ADDITIONAL TITLE III CASE,
(B) PURSUANT TO SECTION 105(A) OF THE BANKRUPTCY CODE,
MAKING CERTAIN ORDERS ENTERED IN THE INITIAL TITLE III CASES
APPLICABLE TO THE ADDITIONAL TITLE III CASE, AND (C) PURSUANT
TO SECTION 105(A) OF THE BANKRUPTCY CODE, MAINTAINING THE
EFFECT OF CERTAIN PLEADINGS FILED IN THE ADDITIONAL TITLE III CASE**

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (iv) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808).

² The last four (4) digits of PREPA's federal tax identification number are 3747.

4. I submit this Affidavit in response to the Order and in support of the Motion. Unless otherwise stated in this Affidavit, I have personal knowledge of, and if called as a witness I would testify to, the facts set forth herein.

Maintaining Epiq's PREPA Website and Call Center is in the Best Interest of the Debtor

5. PREPA is an operating business that generates, transmits, and distributes substantially all the electric power used in Puerto Rico, and is one of the largest municipal utilities in the United States. The maintenance of a separate case website and call center in the PREPA Title III case is important to allay concern and prevent confusion among PREPA's customers, vendors, creditors, employees, and retirees as to the issues that affect them. Any such confusion could negatively affect PREPA's business, customer and vendor relationships, and disrupt operations.

6. Further, there is no monthly charge for Epiq hosting its PREPA website. The only charges incurred would be the result of the minimal professional time required to update the website when a content adjustment request is submitted. Further, Epiq's PREPA website has been active for over two months now and creditors, employees, and vendors have become accustomed to using it. Maintaining Epiq's PREPA website, therefore, will cost PREPA a *de minimis* amount of money and will avoid any potential confusion among PREPA's parties in interest.

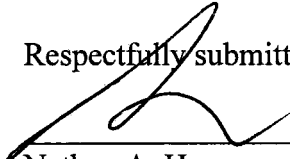
7. Regarding Epiq's call center, PREPA is only charged when the call center receives incoming phone calls so, again, there would be no economic benefit to transferring the call center services over to Prime Clerk. Indeed, Epiq personnel has already been trained to answer PREPA-related questions, so it will be more expensive now to train Prime Clerk personnel to answer such questions instead of continuing with the status quo.

8. To reiterate what was described in the Motion, for other processes that have not commenced yet – primarily, the claims process – Epiq will provide links on its website redirecting parties to the Prime Clerk website, where claims will be administered for all Title III Cases if the Motion is approved.

9. In addition to the services mentioned above, if the Motion is approved, Epiq will provide the same services (and on similar terms) to PREPA as it is currently providing to HTA and ERS.

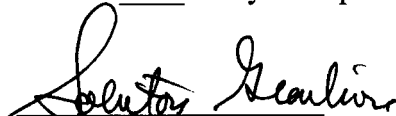
WHEREFORE I respectfully request that the Court approve the Motion.

Respectfully submitted,



Nathan A. Haynes
Shareholder
Greenberg Traurig LLP

SWORN TO AND SUBSCRIBED before
me this 8 th day of September, 2017



Notary Public

SALVATORE GIAMBRONE
Notary Public, State of New York
No. 01GI6098207
Qualified in Queens County
Commission Expires Sept. 8, ~~2017~~ 2019